

JP:MEM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

TANYA DOMENECH,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID SCHRADER, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about January 2, 2015, within the Eastern District of New York and elsewhere, the defendant TANYA DOMENECH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about January 2, 2015, the defendant TANYA DOMENECH arrived at John F. Kennedy International Airport in Queens, New York, aboard JetBlue Airlines Flight 780 from Montego Bay, Jamaica.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


2. Defendant TANYA DOMENECH was selected for a Customs and Border Protection ("CBP") examination. Upon inspection, the bag in question felt unusually heavy for its size and it was discovered to have a false bottom. The defendant TANYA DOMENECH was escorted to a private examination area where the bag in question was further searched.

3. During the search, a CBP Officer noticed that inside the false bottom the bag contained a white powdery substance, which field-tested positive for the presence of cocaine. The defendant TANYA DOMENECH was placed under arrest.

4. The total approximate gross weight of the cocaine recovered from the defendant TANYA DOMENECH was 1,032 grams.

WHEREFORE, your deponent respectfully requests that defendant DAVID SCHRADER be dealt with according to law.

Dated: Brooklyn, New York
January 3, 2014



DAVID SCHRADER
Special Agent
Homeland Security Investigations

Sworn to before me on
the 3 day of ~~September~~ ^{January}, 2015

THE HONORABLE STEVEN M. GOLD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK